

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

United Resource Recovery Corporation,

Plaintiff,

vs.

RamKo Venture Management, Inc. and

John Kohut,

Defendants.

Case Number: 7:07-502-HFF

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANTS'
MOTION TO TRANSFER**

RamKo Venture Management, Inc.,

Third-Party Plaintiff,

vs.

Carlos Gutierrez,

Third-Party Defendant.

Plaintiff, United Resource Recovery Corporation ("URRC"), respectfully moves pursuant to Fed. R. Civ. P. 6(b) and Local Rule 6.01 for a fourteen (14) day extension of time to file a memorandum in opposition to Defendants' Motion to Transfer. URRC shows the following in support of this Motion:

1. URRC's memorandum in opposition to Defendants' Motion to Transfer is currently due Monday, April 23, 2007.

2. The deadline for URRC's memorandum in opposition to Defendants' Motion to Transfer has not been previously extended.

3. URRC requests an extension of fourteen (14) days, i.e., until Monday, May 7, 2007.

4. This requested extension will not affect any other deadlines.

5. URRRC makes this request for an extension because, due to other professional and personal obligations, its counsel need additional time to prepare its memorandum in opposition to Defendants' Motion to Transfer.

6. URRRC's counsel has conferred with Defendants' counsel and Defendants' counsel consents to this requested extension.

WHEREFORE, Plaintiff respectfully requests that its time to file a memorandum in opposition to Defendants' Motion to Transfer be extended to and including May 7, 2007.

This 16th day of April, 2007.

Respectfully submitted,

s/Michael J. Giese

Michael J. Giese (#2094)

Thomas M. Larkin (#9480)

Leatherwood Walker Todd & Mann, P.C.

300 East McBee Avenue, Suite 500

Post Office Box 87

Greenville, SC 29602

(864) 242-6440

(864) 240-2477 (fax)

mgiese@lwtm.com

tlarkin@lwtm.com

ATTORNEY FOR PLAINTIFF

Doc. # 1080111